

Commission's Secretary
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Delivered via Commercial overnight mail to:
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: EB-06-TC-060
Certification of CPNI Filing for the Period Ending December 31, 2005

JBN Telephone Company, Inc. (JBN) and Giant Communications, Inc. (Giant Communicatins) are hereby complying with the January 30, 2006 Public Notice in which the Enforcement Bureau (Bureau) directs all telecommunications carriers to submit a compliance certificate to the Commission as required by Section 64.2009(e)¹ of the Commission's rules.

JBN and Giant Communications hereby certify that they are in compliance with Section 64.2009 of the Commission's rules for the period ending December 31, 2005 and provide an accompanying statement explaining how Western's operating procedures ensure compliance with the FCC's rules.

JBN and Giant Communications complies with Section 222 of the Communications Act of 1934, as amended (the "Act")², that requires that telecommunications carriers protect the privacy of customer proprietary network information ("CPNI").

Sincerely,

Gene Morris
Vice President and General Manager

Cc: Delivered via email to byron.mccoy@fcc.gov
Mr. Byron McCoy
Telecommunications Consumers Division, Enforcement Bureau
Federal Communications Commission
Room 4-A234, 445 12th Street, S.W.
Washington, D.C. 20554

Cc: Deliver via e-mail to fcc@bcpiweb.com
FCC's Copy Contractor Best Copy and Printing, Inc. (BCPI)
Portals II, 445 12th Street, S.W., Room CY-B402

1 47 C.F.R. §64.2009(e).

2 47 U.S.C. §222.

Washington, D.C. 20554
(202) 488-5300

JBN TELEPHONE COMPANY, INC.

Customer Proprietary Network Information (CPNI)

Certification for the Period Ending December 31, 2005

I, Gene Morris, Vice-President and General Manager of (JBN) and President of Giant Communications, Inc. (Giant Communications) due hereby certify that both JBN and Giant Communications are in compliance with the FCC Rules and Regulations § 64.2009 "Safeguards Required for Use of Customer Proprietary Network Information" for the year ended December 31, 2005.

I further certify that I am an officer of both JBN and Giant Communications and have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the rules in § 64.2009.

Exhibit A provides a statement explaining how both JBN and Giant Communications operating procedures ensure that they are both in compliance with the rules in § 64.2009 which are included on Exhibit B.

Gene Morris
2006
JBN Telephone Company, Inc.
Vice-President and General Manager
and Giant Communications, Inc.
President

Date February 2,

Statement of Compliance with Customer Proprietary Network Information (CPNI) Procedures

JBN Telephone Company, Inc. (an ILEC) and Giant Communications, Inc. (a CLEC) do not use the CPNI information for its own or its affiliated company marketing efforts. Furthermore, no customer information will be provided to anyone other than the customer and the E-911 database except under a court order. The customer is verified by means of either their social security number, or by means of a special password that is created by the customer. Once verification of the customer is made, the customer can get their balance, what carrier they are presubscribed to, or questions answered on their bill.

E-911:

Database Updates: Updates of customer information is provided to the E-911 database including the customer name, phone number, whether it is a residential or business, and service location address.

E-911 addressing: If the E-911 Database provider is doing the physical addressing out in the field for areas lacking formal addresses, the Company will provide the customer name, phone number and service location only once the Database provider submits a signed, notarized statement that the data will only used for E-911 addressing purposes.

Court Orders:

If the proper approved legal documents, including an approved Court Order, is received by the Company, the Company will provide law enforcement or the appropriate legal entity with the requested information only after determining that the request is in compliance with all necessary laws and/or regulations.

Sheri Cothran, Business Office Supervisor, or Jean Stedman, CALEA Compliance Officer, retains requests of this type under lock for a period of at least five years. JBN has never received a request of this type.

State or County Requests:

The Company will not provide any informal requests for customer information lacking a court order.

Review of CPNI Procedures:

For JBN Telephone Company, Inc., Sheri Cothran, Business Office Supervisor, reviews the Company's CPNI procedures periodically to determine that full compliance with the FCC's rules are adhered to. For Giant Communications, Gene Morris, reviews the CPNI procedures periodically to determine that full compliance with the FCC's rules are adhered to.

As part of the new employee orientation, all business office employees of both companies are informed that they are not allowed to give out any customer information to anyone

other than the customer. Any special requests for customer information are referred to Sheri Cothran or Gene Morris.

FCC Rules on Customer Proprietary Network Information (CPNI)

§ 64.2009 Safeguards Required for Use of Customer Proprietary Network Information.

- (a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
- (b) Telecommunications carriers must train their personnel as to when they are, and are not, authorized to use CPNI, and carriers must have an express disciplinary process in place.
- (c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.
- (d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.
- (e) A telecommunications carrier must have an officer, as an agent of the carrier, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is, or is not, in compliance with the rules in this subpart.
- (f) Carriers must provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.
 - (1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
 - (2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.